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**Title:** Customer Contact, Complaints Handling, and Compensation - Scotland Policy

**Business Function:** Sanctuary Scotland  
Sanctuary Homes (Scotland) Limited

**Authors:** Service Development Manager

**Authorised by:** Sanctuary Scotland Board of Management  
Executive Committee

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**Sanctuary in Scotland:**  
Sanctuary Scotland Housing Association Limited is a subsidiary of  
Sanctuary Housing Association, an exempt charity.

Sanctuary Homes (Scotland) Limited is a subsidiary of Sanctuary Scotland Housing Association.

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## 1. Policy statement

- 1.1 Sanctuary Scotland (Sanctuary) aims to provide a high quality service and values complaints and customer feedback. Despite the high standards of service, there may be times when the experience is less than satisfactory. Sanctuary offers a variety of means to respond to and learn from expressions of dissatisfaction and actively encourages customer feedback, acknowledges this contact and uses it to inform and influence service delivery.
- 1.2 This policy and associated procedures outline how Sanctuary aims to deliver high standards of customer service; including how we handle communications with customers, how we deal with complaints, and how we deal with compensation requests. It details how Sanctuary seeks to resolve customer dissatisfaction as close as possible to the first point of contact and treat residents and stakeholders as valued customers. Where feedback has been positive, it seeks to ensure that best practice is shared and encouraged.
- 1.3 The procedure covers a broad range of subjects, including how Sanctuary:
- aims to treat customers fairly;
  - expects third parties working on its behalf to treat customers, with respect and dignity (see [Customer Contact, Complaints Handling and Compensation - Scotland Procedure](#) section A 2.1);
  - aims to be transparent and efficient with all customer contact and complaints handling;
  - deals with telephone calls, letters, emails and other forms of communication in a timely manner;
  - responds to different language and communication needs; and
  - respects confidentiality and data protection.
- 1.4 Sanctuary believes that complainants have a right to be heard, understood and respected. The management of complaints and compensation requests is detailed within the [Customer Contact, Complaints Handling and Compensation - Scotland Procedure](#). The Complaints Handling section is based on the model Complaints Handling Procedure (model CHP) written by the Scottish Public Services Ombudsman which all Registered Social Landlords in Scotland must comply with. The foreword for the model CHP is shown in **Appendix 1**.
- 1.5 Sanctuary aims to take a resolution-focussed approach to complaints, to resolve problems or improve difficult situations. Staff handling complaints will be encouraged to identify the best route to address both the type of complaint and what would be the most appropriate process for the complainant; acknowledging and addressing complainant's emotions through respectful dialogue before the logistical problem is looked into. In this way, Sanctuary aims to build positive working relationships with customers and go beyond investigating the principles of complaints.

1.6 The objective of the policy is to ensure that customers receive a high standard of service, that feedback is listened to and acted upon and that in turn, Sanctuary can improve satisfaction with customer's views being taken into account. Below is a summary of Sanctuary's commitments it seeks to achieve in relation to complaints, compensation and overall standards of customer service:

- to ensure equal and fair access to all areas of service;
- to create a corporate ethos that will reflect excellent customer service;
- to understand its customer profile and deliver services in ways which promote equality and inclusiveness;
- ensure customers know about Sanctuary's services and how to access them;
- set standards in relation to customer contact and monitor progress;
- ensure customers can contact Sanctuary, and it can contact them, by their preferred method of communication;
- ensure staff are approachable, respectful, professional and welcoming;
- welcome all customer feedback and report the lessons learnt back to customers and wider customers;
- develop a greater awareness among staff at all levels about what good customer care looks like; training staff in customer service skills to enable us to meet and exceed customer expectations;
- be easy to contact, resolving enquiries quickly and knowledgeably; and
- resolve issues the first time a customer contacts us, and keep customers updated with progress so they do not have to chase us.

## 2. Roles and responsibilities

2.1 The Director - Sanctuary Scotland has responsibility to ensure this policy is followed within Sanctuary Scotland and managed appropriately.

2.2 All staff have day to day responsibility for the implementation of this policy in practice.

2.3 To assist Sanctuary in carrying out its obligations, all employees must:

- Be aware of, understand and comply with this policy and any related operational guidance;
- Participate in any training which Sanctuary makes available; and
- Communicate any issues with implementing this policy to their line manager or the Service Development team and identify opportunities for continuous improvement.

## 3. References and sources

3.1 The following legislation, references and sources are relevant to the development and delivery of this policy and associated procedure:

- [Care Inspectorate](#)
- [Disability Discrimination Act 1995](#)
- [Data Protection Act 1998](#)

- [General Data Protection Regulation](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)
- The [Model Complaints Handling Procedure for Registered Social Landlords](#), Scottish Public Services Ombudsman (SPSO) (2020) sets out statutory guidance on complaints handling.
- The [SPSO Act 2002](#) (as amended by the [Public Service Reform \(Scotland\) Act 2010](#)), Ombudsman has notified all Registered Social Landlords in Scotland to inform them that the relevant model CHP applies to them. The 2002 Act was updated further on 31 January 2020; section 16B(5) presents the updated [Model Complaints Handling Procedures \(MCHP\)](#).
- The [Scottish Secure Tenants \(Right to Repair\) Regulations 2002](#) sets out rules on compensation for when social landlords do not complete qualifying repairs within target timescales.
- The [Land Compensation \(Scotland\) Act 1973](#) and the [Home Loss Payment \(Specification of Amount\) \(Scotland\) Regulations 1989](#) set out rules on compensation amounts for tenants and owners if they are to be displaced due to demolition or other redevelopment proposals affecting their home.
- The [Housing \(Scotland\) Act 2001](#) sets out rules in relation to compensation for tenants who have carried out improvements to their home.
- [Mental Health \(Care and Treatment\) \(Scotland\) Act 2003](#)
- [Scottish Social Housing Charter \(2017\)](#) Section 2 Communication
- [Antisocial Behaviour and Harassment - Scotland Policy and Procedure](#)
- [Adult Support and Protection \(Safeguarding\) - Scotland Policy and Procedure](#)
- [Safeguarding Children and Young People - Scotland Policy and Procedure](#)
- [Customer Contact, Complaints Handling and Compensation - Scotland Procedure](#)
- [Social Media - Group Policy and Procedure](#)
- [SPSO Customer Facing Guide \(MCHP Part 5\)](#)

#### 4. Impact on diversity

- 4.1 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with the '[Sanctuary Inclusion for All Strategy 2024-2026](#)'.
- 4.2 Sanctuary has a legal duty to make the complaints service accessible under equalities and mental health legislation. For example:
- the Equality Act 2010 gives people with a protected characteristic the right to reasonable adjustments to access our services (such as large print or BSL translations of information); and

- the Mental Health (Care and Treatment) (Scotland) Act 2003 gives anyone with a 'mental disorder' (including mental health issues, learning difficulties, dementia and autism) a right to access independent advocacy. This must be delivered by independent organisations that only provide advocacy. They help people to know and understand their rights, make informed decisions and have a voice.

#### 4.3 Examples of how Sanctuary will meet legal duties are:

- proactively checking whether members of the public who contact us require additional support to access our services;
- providing interpretation and/or translation services for British Sign Language users; and
- helping customers access independent advocacy (the Scottish Independent Advocacy Alliance website has information about local advocacy organisations throughout Scotland).

#### 4.4 Sanctuary will make it clear what actions staff can take to support equal access to the complaints process (including vulnerable groups) and will:

- use the principle of 'universal design' to ensure our services are accessible in a number of ways to suit different people and situations. This will be done through providing different ways to make a complaint, online, in person, in writing, verbally, over the phone and during office opening hours, or out of hours. It will also be done through clear content design with the information and advice Sanctuary provides verbally or through complaints literature and correspondence;
- be responsive and flexible in how we engage with people; and
- collect and use data to continuously improve our services for vulnerable people.

#### 4.5 Sanctuary will be mindful of complainants' vulnerabilities throughout all customer contact and complaints handling. Vulnerable groups may include and are not limited to:

- learning difficulties;
- mental health problems;
- physical disabilities;
- poor literacy or numeracy skills;
- digital exclusion (lack of technology or know-how to access online services)
- chronic or terminal illnesses;
- addiction issues;
- being a person with a conviction;
- people fleeing domestic abuse;
- being a young person leaving local authority care;
- being a kinship carer;
- being a lone parent;
- experiencing separation, relationship or family breakdown;
- having responsibility as a main care giver;
- homelessness or threat of homelessness;

- having an unsettled way of life; and
- leaving the armed forces.

4.6 Sanctuary will promote best practice as exemplified in the [SPSO Complainants with Vulnerabilities](#) guide and further detail can be found in the [Customer Contact, Complaints Handling and Compensation - Scotland Procedure section A - 4.5 and section B - 17.](#)

## **5. Customer consultation**

5.1 The SPSO consulted widely with tenants in the development of the original Registered Social Landlord (RSL) model CHP. The initiative to streamline and standardise CHPs across the sector was, and continues to be, driven by a focus on the needs of all customers. The RSL MCHP already takes account of many common tenant concerns in relation to complaints.

## **6. Monitoring and compliance**

6.1 Period of review

6.1.1 Until a new policy is formally adopted this document will remain in force and operational.

6.1.2 This policy will be reviewed in accordance with the policy review programme agreed by relevant governing bodies.

6.1.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Director of Sanctuary Scotland will initiate an immediate review.

6.1.4 Where appropriate, key stakeholders, customers and interested parties will be consulted as part of any review of this policy.

## **7. Approval**

7.1 This policy is approved by the Sanctuary Scotland Board of Management.

## **8. Operational arrangements**

8.1 All staff across Sanctuary Scotland must cover this procedure as part of their induction and must be given refresher training as required, to ensure they are confident in identifying complaints, empowered to resolve simple complaints on the spot, and familiar with how to apply this procedure (including recording complaints).

- 8.2 Complaints give us valuable information we can use to improve service provision and customer satisfaction. Our complaints handling procedure will enable us to address a customer's dissatisfaction and may also prevent the same problem happening again. For our staff, complaints provide a first-hand account of the customers' views and experience and can highlight problems we may otherwise miss. Handled well, complaints can give our customers a form of redress when things go wrong and can also help us continuously improve our services.
- 8.3 Handling complaints early creates better customer relations. Handling complaints close to the point of service delivery means we can deal with them locally and quickly, so they are less likely to escalate to the next stage of the procedure. Complaints that we do not handle swiftly can greatly add to our workload and are more costly to administer.
- 8.4 The complaints handling procedure will help us do our job better, improve relationships with our customers and enhance our public perception. It will help us keep the customer at the heart of the process, while enabling us to better understand how to improve our services by learning from complaints.